

BEFORE THE  
FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON, D.C. 20554

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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

In the Matter of	)	
	)	
The Southern New England	)	
Telephone Company	)	
	)	
Implementation of the	)	CC Docket No. 96-128
Pay Telephone Reclassification	)	
and Compensation Provisions	)	
of the Telecommunications	)	
Act of 1996	)	

**REPLY COMMENTS OF**  
**THE SOUTHERN NEW ENGLAND TELEPHONE COMPANY**

The Southern New England Telephone Company ("SNET") respectfully submits these Reply Comments in response to Comments filed by the American Public Communications Council ("APCC"), AT&T Corp. ("AT&T"), the International Telecard Association ("ITA") and the Personal Communications Industry Association ("PCIA").

**I. SNET Has Been Diligent in Its Deployment of Flex ANI.**

SNET began installing Flex ANI in its end offices in the first quarter of 1998 and had planned to be fully compliant by December 31, 1998. During the installation and subsequent testing of the Flex ANI features, SNET's engineers identified certain problems that required technical solutions engineered by its switch vendors, Nortel and Lucent. The technical problems that SNET's engineers encountered were not controllable by SNET. These problems necessitated the application of temporary "fixes" and, in certain circumstances, lease arrangements with these vendors until a permanent solution was available.

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SNET has continued to work diligently with all its switch vendors to expeditiously resolve each and every problem that emerged during the installation process. This is evidenced by the response<sup>1</sup> provided to Anna Gomez, Chief of the Network Services Division, to questions raised by the Federal Communications Commission's ("Commission's") December 29, 1998 letter. SNET responded immediately to each new problem identified during this implementation process, and as necessary, provided the Commission with detailed explanations of any unexpected delays. One of the delays resulted from a four-week work stoppage involving SNET's bargaining unit personnel. This work stoppage brought the implementation work for Flex ANI installation to a complete halt for the four weeks of the work stoppage plus an additional four-week recovery period. Despite these unexpected challenges and delays, SNET plans to be fully Flex ANI compliant by May, 1999.

**II. SNET Plans Full Compliance by May, 1999 and Has Shown  
Good Cause For Waiver of Its Limited Remaining Problems.**

In its Petition for Expedited Waiver ("Petition"), SNET outlined three remaining problems that were identified during the installation of Flex ANI: 1) tandem screening for toll-free numbers ("tandem screening"), 2) toll-free numbers translated to POTS numbers ("800 to POTS"); and 3) the need for modernization of two central offices to digital technology. The need to correct these remaining problems was identified during the testing process, and the remaining problems are of very limited duration. Moreover, it should be noted that it is only the current inability to provide tandem level post-query

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<sup>1</sup> SNET Letter to Anna Gomez, Chief-Network Services Division, dated January 8, 1999, CC Docket No. 96-128; NSD-L-98-147.

screening on toll-free number calls which prevents four central offices from being fully Flex ANI capable.<sup>2</sup> Indeed, had the Commission initially mandated that all interexchange carriers accept Flex ANI digits by a date certain as APCC suggests,<sup>3</sup> SNET would have avoided significant additional expenses. Finally, it should be noted that payphones in these four offices are potentially affected only to the extent that interexchange carriers have not ordered the Flex ANI feature. To date, SNET has received requests to convert only 31 Carrier Identification Codes (CICs) to Flex ANI out of a total of approximately 128 Feature Group D (FGD) CIC Codes.<sup>4</sup>

The second problem, the inability to forward Flex ANI digits on 800 to POTS calls, is of an even greater de minimus nature. Although SNET is unable to determine the number of 800 to POTS calls originated from payphones, there is no question that the quantity of payphone calls affected by this problem is very small. During the entire calendar year of 1998, SNET performed less than 2,000 800 to POTS-type queries for FGD interexchange carriers. These calls represent less than .0002% of all 800 queries and were generated from all of SNET's 2 million access lines. Therefore, should the Commission determine that a permanent waiver of the 800 to POTS requirement is warranted, SNET respectfully requests that it also be granted a waiver.

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<sup>2</sup> The four offices are New Canaan, Wilton, Stratford and Milford. All four will be Flex ANI capable upon deployment of the Lucent tandem screening feature scheduled for May, 1999.

<sup>3</sup> APCC Comments, p. 10.

<sup>4</sup> SNET estimates that these 31 CICs account for approximately 26% of SNET's FGD originating interstate access minutes.

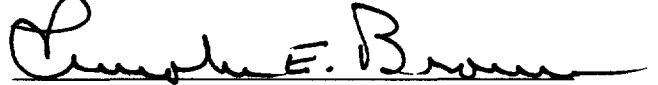
As described in its Petition, SNET outlined detailed plans for full compliance by May, 1999 with the Commission's requirement to provide payphone-specific coding digits. Nothing has changed since the filing of that Petition that will affect this implementation plan.

**IV. Conclusion.**

In its Petition, SNET has fully outlined its plans to be in compliance with the Commission's requirement to provide payphone-specific coding digits by May, 1999. Problems with the installation were beyond SNET's control. Therefore SNET respectfully requests the Commission grant SNET's Petition for an extension of time of the Commission's effective date to May, 1999.

Respectfully submitted,

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February 5, 1999

**CERTIFICATE OF SERVICE**

I, Barbara C. Majeski, hereby certify that SNET's Reply Comments have been  
filed this 5<sup>th</sup> day of February, 1999, to all parties listed below.

  
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